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IMPLEMENTATION OF GARB CONSERVATION DURING PERIODS OF SHORTAGE

On March 10, 2020, Governor Charles D. Baker declared a State of Emergency in the Commonwealth to respond to the spread of COVID-19. On March 24, 2020, the Commissioner of Public Health issued an Order authorizing retail pharmacies and hospital pharmacies that perform sterile compounding to implement measures to conserve protective garb.

Specifically, the Order authorizes retail pharmacies and institutional pharmacies that engage in sterile compounding to implement garb conservation measures during periods of documented shortage or potential shortage provided the following requirements are satisfied:

- The pharmacy develops and maintains a written policy that describes conservation measures to be undertaken and mitigation strategies to minimize risk of contamination.
- The pharmacy should implement *USP Response to Shortages of Garb and Personal Protective Equipment (PPE) for Sterile Compounding During COVID-19 Pandemic* for best practices during the shortage period:
<https://www.usp.org/sites/default/files/usp/document/about/public-policy/usp-covid19-garb-and-ppe.pdf>
- The pharmacy should consider consulting with a microbiologist, infection control professional, or industrial hygienist for guidance on additional cleaning procedures and conducting more frequent environmental and personnel monitoring.
- **Beyond-Use-Dates (BUDs) should be the shortest possible to meet patient needs but may not exceed 30 hours room temperature or 9 days refrigerated.**
- Garb used for non-sterile to sterile (i.e. high risk) compounding may not be reused.

Please refer to the following resources on COVID-19 for development of internal practices to facilitate appropriate response and safe practice.

- CDC's Interim Guidance on preventing COVID-19 from spreading, which includes Strategies for Optimizing the Supply of N95 Respirators
<https://www.cdc.gov/coronavirus/2019-ncov/hcp/respirators-strategy/>
- Healthcare Supply of Personal Protective Equipment
<https://www.cdc.gov/coronavirus/2019-ncov/hcp/healthcare-supply-ppe.html>

- FDA's Surgical Mask and Gown Conservation Strategies - Letter to Healthcare Providers
<https://www.fda.gov/medical-devices/letters-health-care-providers/surgical-mask-and-gown-conservation-strategies-letter-healthcare-providers>
- NIOSH List of Antineoplastic and Other Hazardous Drugs in Healthcare Settings, 2016
<https://www.cdc.gov/niosh/docs/2016-161/pdfs/2016-161.pdf>
- Remediation Considerations for Handling Above Action Level Environmental Monitoring (EM) Results
<https://www.mass.gov/advisory/remediation-considerations-for-handling-above-action-level-environmental-monitoring-em>

All applicable statutes, regulations, guidance not inconsistent with the Order and this guidance remain in effect.

The Order and this guidance are effective immediately and shall remain in effect until the State of Emergency is terminated by the Governor, or the Order is rescinded by the Commissioner, whichever shall happen first.